

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARK SINGER,)	
)	
Plaintiff,)	CASE NO. 19-CV-3954
)	
v.)	Honorable Elaine E. Bucklo
)	
CITY OF CHICAGO,)	
)	
Defendant.)	

JOINT STATUS REPORT

The parties, by their undersigned counsel, respectfully submit the following Joint Status Report:

A. Progress of Discovery

The parties completed Plaintiff's deposition following Plaintiff's recovery from surgery. The only fact deposition remaining is the City's 30(b)(6) deposition. The parties have agreed to complete the City's 30(b)(6) deposition within the time previously set for expert discovery. The City opposes extension of fact discovery for any purpose other than completion of the 30(b)(6) deposition. Plaintiff does not seek any other fact discovery. The parties have determined that they will not retain expert witnesses.

B. Status of Briefing on Any Unresolved Motions

No pending motions.

C. Settlement Efforts

The parties have not discussed settlement.

D. Proposed Schedule for Next 45 Days

The parties will complete the City's 30(b)(6) deposition and any expert discovery by September 29, 2021.

E. Proposed Revised Discovery and Dispositive Motion Schedule

Fact Discovery Completion: September 29, 2021

Expert Discovery Completion: September 29, 2021

Date for Filing Dispositive Motions: October 20, 2021

F. Any Agreed Action the Court Can Take without a Hearing

Enter revised discovery schedule.

G. Whether a Telephonic Hearing Is Necessary and Time Urgent

No.

DATE: July 23, 2021

Respectfully Submitted,

MARK SINGER

By: /s/ Marko Duric

Robert Robertson

Marko Duric

ROBERTSON DURIC

One North LaSalle, Suite 300

Chicago, Illinois 60602

(312) 223-8600

robrobertson1@sbcglobal.net

marko@robertsonduric.com

CITY OF CHICAGO

By: /s/ Cheryl Friedman (w/ permission)

Cheryl L. Friedman

Bret Kabacinski

City of Chicago Department of Law

30 North LaSalle, Suite 900

Chicago, Illinois 60602

(312) 744-4038

Cheryl.Friedman1@cityofchicago.org

Bret.Kabacinski@cityofchicago.org